BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN KE:		
DOCKET 2005-100-C)	
Generic Proceeding Established to)	
Investigate Emergency Services)	
Continuity Plans)	PETITION TO INTERVENE
)	OF VERIZON SOUTH, INC.
)	
)	
)	

Pursuant to South Carolina Code of Regulations R 103-836A(3), Verizon South Inc. ("Verizon" or "Company") hereby petitions the South Carolina Public Service Commission ("Commission") for permission to intervene in the above-captioned proceeding. In support of its petition, Verizon states as follows:

- 1. The Company is a corporation and entity existing under the laws of Virginia and has been certified by the Commission to provide, and is currently providing, local exchange, coin, access and intraLATA toll telecommunications services in South Carolina, which are services subject to the jurisdiction of the Commission.
- 2. For purposes of this proceeding, Verizon's authorized and legal representatives in this matter, to whom all correspondence or communications should be addressed, are:

Mr. Stan Bugner, State Director VERIZON COMMUNICATIONS INC. 1301 Gervais St. – Suite 825 Columbia, S. C. 29201 803-254-5736 803-254-9626 facsimile stan.bugner@verizon.com Steven W. Hamm, Esquire
C. Jo Anne Wessinger Hill, Esquire
RICHARDSON, PLOWDEN, CARPENTER &
ROBINSON, P.A.
1600 Marion Street
P.O. Box 7788
Columbia, South Carolina 29202
803-771-4400
803-771-0016 facsimile
shamm@rpcrlaw.com

- 3. On or about April 3, 2003, the Commission issued Order No. 2003-218, in Docket No. 2003-89-C, wherein the Commission held that a generic proceeding should be established to investigate emergency services continuity plans in general and their various ramifications.
- 4. On or about April 19, 2005, the Commission issued a Notice of Generic Proceeding, in Docket No. 2005-100-C to investigate the general concept of an emergency services continuity plan.
- 5. In this proceeding, Verizon intends to make clear that an emergency services continuity plan will afford assurance for continued service to end-users impacted by a competitive local exchange carrier's ("CLEC's") exit from the local market.
- 6. Verizon has a direct and substantial interest in this docket, given that it provides wholesale services to CLECs and is a designated carrier-of-last-resort. Therefore, Verizon respectfully requests permission to intervene in this matter as a full party of record.
- 7. Verizon's participation in this docket will help to develop a full and fair record, which, in turn, will assist the Commission competently to resolve the issues in this proceeding.
- 8. Verizon's request to be made a party of record in this docket is in the public interest, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record.

Accordingly, Verizon respectfully requests that the Commission, (1) grant this request and issue an order permitting Verizon to participate in this proceeding as a full party of record; (2) allow Verizon to participate fully in the this proceeding and to take such positions as it deems advisable; and (3) grant any other and further relief as is just and proper.

Respectfully submitted this 11th day of May, 2005.

VERIZON SOUTH INC.

BY:			

Richard Chapkis Verizon South Inc. One Tampa City Center 201 N. Franklin Street FLTC0007 Tampa, Florida 33601 813-483-1256 richard.chapkis@verizon.com

Its Attorneys

Steven W. Hamm
C. Jo Anne Wessinger Hill
Richardson, Plowden, Carpenter & Robinson
1600 Marion Street
P.O. Box 7788
Columbia, South Carolina 29202
803-771-4400
shamm@rpcrlaw.com
jwessingerhill@rpcrlaw.com